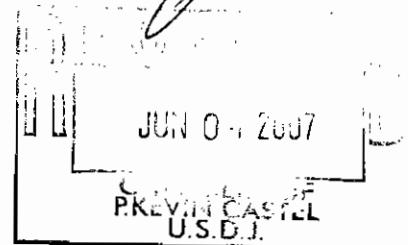




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Conference adjourned
 from June 15 to 10:00 a.m.
 July 27, 2007 at 10:00 a.m.
 S. G. Belknap
 JSOS
 6-4-07

June 1, 2007

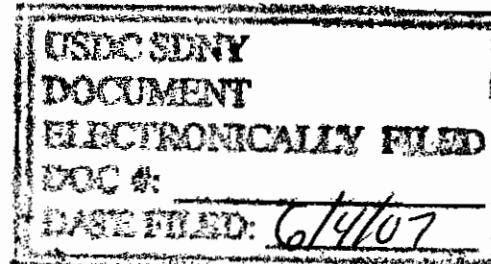


MEMO ENDORSED

BY HAND

Honorable P. Kevin Castel
 United States District Judge
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Room 2260
 New York, New York 10007-1312

Re: Allied Maritime Inc., et al. v. Milan Nigeria, Ltd.
 07 Civ. 3522 (PKC)
 Our Ref. No.: 601704-00002



Dear Judge Castel:

We represent plaintiffs in the above-referenced matter. As the Court may be aware, this is a maritime action filed pursuant to Rule B of the Supplemental Rules for Admiralty or Maritime Claims which seeks attachment of up to \$1,890,041.85 of defendant's funds as security for plaintiffs' claims against defendant for breach of vessel charter party, the merits of which are subject to arbitration in London. The Court has scheduled a preliminary conference in this matter for June 15, 2007 at 11:45 a.m. We respectfully request that that conference be adjourned for between 45 and 60 days.

The lawsuit was commenced on May 2, 2007 and, on that same day, this Court entered an order authorizing the clerk to issue process of maritime attachment and garnishment to be served on a number of bank garnissees. Although plaintiffs arranged with the clerk for issuance of the writ, they have not yet effected service of the writ on any of the garnissees because plaintiffs and defendant are currently in the midst of negotiations for voluntary provision of security and/or resolution of the claims. If these negotiations are successful, then it would not be necessary to maintain this action.

If discussions with defendant prove unsuccessful, and if the writ is served and funds are attached, Local Admiralty Rule B(2) provides for prompt notice to the defendant of such



Honorable P. Kevin Castel
June 1, 2007
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attachment and provides the defendant with an opportunity for prompt hearing on the propriety of the attachment. Because the merits of the claim are subject to arbitration in London, no other "litigation" is expected to occur in this action except in the event of an attachment.

For the foregoing reasons, Plaintiffs respectfully submits that a conference would serve no practical purpose at this time. Accordingly, plaintiffs respectfully request that the conference currently scheduled for June 15 be adjourned for 45-60 days.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "THBul" followed by a stylized surname.

Thomas H. Belknap, Jr.

THB:eb